

WILLIAM LIPINSKI

November 1, 2011

<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE NORTHERN DISTRICT OF ILLINOIS</p> <p>3 EASTERN DIVISION</p> <p>4 COMMITTEE FOR A FAIR AND )</p> <p>5 BALANCED MAP, et al., )</p> <p>6 Plaintiffs, )</p> <p>7 vs. ) 1:11-cv-05065</p> <p>8 ILLINOIS STATE BOARD OF )</p> <p>9 ELECTIONS, et al., )</p> <p>10 Defendants. )</p> <p>11</p> <p>12 The videotaped deposition of WILLIAM LIPINSKI,</p> <p>13 called for examination, taken pursuant to the</p> <p>14 provisions of the Code of Civil Procedure and the</p> <p>15 rules of the Supreme Court of the State of Illinois</p> <p>16 pertaining to the taking of depositions for the</p> <p>17 purpose of discovery, taken before KAREN PILEGGI, a</p> <p>18 Notary Public within and for the County of DuPage,</p> <p>19 State of Illinois, and a Certified Shorthand</p> <p>20 Reporter of said state, at 71 South Wacker Drive,</p> <p>21 Chicago, Illinois, November 1, 2011, at the</p> <p>22 approximate hour of 10:57 a.m.</p>	<p>1 PRESENT: (Continued)</p> <p>2 HINSHAW &amp; CULBERTSON, LLP,</p> <p>3 (222 North LaSalle Street, Suite 300,</p> <p>4 Chicago, Illinois 60601,</p> <p>5 312-704-3000), by:</p> <p>6 MR. ROBERT T. SHANNON,</p> <p>7 rshannon@hinshawlaw.com,</p> <p>8 appeared on behalf of the deponent</p> <p>9 Congressman Lipinski.</p> <p>10</p> <p>11</p> <p>12 VIDEOGRAPHER: Kevin Dailey, Esquire.</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23 REPORTED BY: Karen L. Pileggi, CSR, RMR, CRR.</p> <p>24 CSR License No. 84-3404</p>
<p>1 PRESENT:</p> <p>2 MAYER BROWN, LLP,</p> <p>3 (71 South Wacker Drive, Suite 3200,</p> <p>4 Chicago, Illinois 60606,</p> <p>5 312-782-0600), by:</p> <p>6 MS. LORI LIGHTFOOT,</p> <p>7 llightfoot@mayerbrown.com,</p> <p>8 appeared on behalf of the Plaintiffs;</p> <p>9</p> <p>10 POWER, ROGERS &amp; SMITH, P.C.,</p> <p>11 (70 West Madison Street, 55th floor,</p> <p>12 Chicago, Illinois 60602,</p> <p>13 312-236-9381), by:</p> <p>14 MR. DEVON C. BRUCE,</p> <p>15 dcbruce@prslaw.com,</p> <p>16 appeared on behalf of the Defendants;</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>1 THE VIDEOGRAPHER: Good morning. We're going</p> <p>2 on the video record at 10:57 a.m. My name is</p> <p>3 Kevin Dailey and I'm the legal videographer in</p> <p>4 association with Esquire Deposition Solutions. Our</p> <p>5 address is 311 West Monroe, Chicago, Illinois.</p> <p>6 The court reporter is Karen Pileggi also</p> <p>7 of Esquire Deposition Solutions. Here begins the</p> <p>8 videotaped deposition of William Lipinski taking</p> <p>9 place at 71 South Wacker Drive, Chicago, Illinois.</p> <p>10 Today's date is November 1st, 2011. This deposition</p> <p>11 is being taken in the matter of Committee for a Fair</p> <p>12 and Balanced Map, et al., versus the Illinois State</p> <p>13 Board of Elections, et al., being heard before the</p> <p>14 United States District Court, Northern District of</p> <p>15 Illinois, Eastern Division.</p> <p>16 Will counsel please state their names for</p> <p>17 the record.</p> <p>18 MR. BRUCE: Devon, D-e-v-o-n, Bruce on behalf</p> <p>19 of the defendants.</p> <p>20 MS. LIGHTFOOT: Lori Lightfoot on behalf of the</p> <p>21 plaintiffs.</p> <p>22 MR. SHANNON: Robert Shannon representing</p> <p>23 Congressman Lipinski for the purposes of this</p> <p>24 deposition.</p>



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<p>1 THE VIDEOGRAPHER: Will the reporter please 2 swear in the witness. 3 (WHEREUPON, the witness was 4 duly sworn.) 5 THE WITNESS: I do. 6 WILLIAM LIPINSKI, 7 called as the witness herein, having been first duly 8 sworn, was examined and testified as follows: 9 EXAMINATION 10 BY MS. LIGHTFOOT: 11 Q. Sir, could you state your name and spell 12 your last name for the record. 13 A. William Lipinski, L-i-p-i-n-s-k-i. 14 Q. Have you ever had your deposition taken 15 before, Congressman? 16 A. Yes, I have. 17 Q. By virtue of the fact you had to think 18 about it, I suspect it was probably a while ago. 19 A. It was a long time ago, yes. 20 Q. Let me give you a few basic rules of the 21 road. 22 Because as you see there's a court 23 reporter taking down a verbatim transcript of 24 everything that's going to be discussed here today,</p>	5	<p>1 to answer a question, you are still obliged to 2 answer the question, even with an objection. 3 I will tell you that most witnesses, if 4 there's an objection, tend to forget what the 5 question is. Again, that's the benefit of having a 6 court reporter here, because we can just have the 7 question read back or I can restate it. 8 I think that's all we need to discuss for 9 purposes of today. As I said, we won't be here that 10 long. I don't think we'll be here longer than an 11 hour plus, but if at any time you need to take a 12 break, feel free to do so. 13 The only thing that I would ask is you 14 not take a break while there's a question pending; 15 unless, of course, you need to confer with your 16 lawyer and you can feel free to do that. 17 With that I'm going to kind of take you 18 through your background and get on to the issues 19 that brought us here today and then try to get you 20 out of here as quickly as possible. 21 I referred to you as congressman. You 22 are the former congressman of the Third 23 Congressional District of Illinois, correct, sir? 24 A. That is correct.</p>	7
<p>1 there are a couple of important rules that flow from 2 that. The first is that you and I should endeavor 3 not to talk over each other. We're not going to be 4 here long today. I'm going to see if I can get this 5 done you start in record time. 6 Even so, it's important that you allow me 7 to ask my questions before you start to answer, even 8 if you know the answer. 9 And by the same token I will endeavor to 10 allow you to answer before I ask any follow-up or 11 new question. 12 The other thing that's important because 13 the court reporter is taking down a verbatim 14 transcript is that you must answer audibly. 15 It happens with virtually every witness 16 that there will be times when you nod your head or 17 do some other nonverbal response to a question. 18 If you forget, I'll try to remind you or 19 I'm sure your able counsel will remind you as well. 20 The other thing that's important is there 21 may be from time to time objections that are 22 interposed on the basis of a question I've asked. 23 Objections are kind of standard fare in 24 these things. Unless your lawyer instructs you not</p>	6	<p>1 Q. Let me just go back through a little bit 2 of your elected history. 3 As I understand it, you were -- before 4 you were a congressman for the third district, you 5 were actually congressman for the fifth district; is 6 that correct, sir? 7 A. That is correct. 8 Q. And then as a result of the decennial 9 census in 1993, Illinois lost population and you 10 were put in the same district as former congressman 11 Marty Russo; is that correct, sir? 12 A. That is correct. 13 Q. And then you and Mr. Russo ran against 14 each other in a 1992 democratic primary and you were 15 successful; is that correct? 16 A. That's correct. 17 Q. And thereafter you continued to serve as 18 the elected representative of the third 19 congressional district until you announced your 20 retirement -- you announced your retirement in the 21 summer of 2004 and you officially retired, I 22 believe, in January of 2005; is that correct? 23 A. That is correct. 24 Q. The person who succeeded you as the</p>	8



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<p>1 representative from the third district is your son, 2 Daniel Lipinski; is that correct, sir? 3 A. That is correct. 4 Q. You're familiar with someone by the name 5 of Jerry Costello; is that correct, sir? 6 A. Yes, that is correct. 7 Q. Mr. Costello is a member of Congress from 8 Southern Illinois; is that correct? 9 A. That is correct. 10 Q. And you and he served together in the 11 House of Representatives as fellow members from the 12 Illinois Congressional Delegation; is that correct? 13 A. That is correct. 14 Q. You're also familiar with somebody by the 15 name of Michael Madigan; is that correct? 16 A. That is correct. 17 Q. Michael Madigan has been for a number of 18 years the Speaker of the House of Representatives 19 here in Illinois; is that correct? 20 A. That's correct. 21 Q. You're also familiar with somebody by the 22 name of John Cullerton; is that correct, sir? 23 A. Yes, that is correct. 24 Q. You know John Cullerton, at least in 2001</p>	<p>1 Q. And by "bipartisan map" you're talking 2 about a congressional map for Illinois; is that 3 correct, sir? 4 A. Yes. A map that could be agreed to by 5 the Democrats and the Republicans, or at least a 6 large majority of those people. 7 Q. Why did you agree to participate in that 8 meeting, sir? 9 A. First of all, because Jerry Costello was 10 a friend of mine and had been for a long time. 11 Secondly, I had been very much involved 12 in the redistricting ten years prior. 13 Speaker Hastert and I had worked out a 14 map that was a bipartisan agreement and Jerry hoped 15 that I would be able to aid and assist him in doing 16 that. 17 Q. What was discussed at that -- I'll call 18 it the February 2011 meeting? 19 MR. BRUCE: Standing objection on hearsay and 20 relevance. 21 MR. SHANNON: You can answer. 22 BY THE WITNESS: 23 A. Would you repeat the question? 24</p>
<p>1 to be the president of the Illinois Senate; is that 2 correct, sir? 3 A. Well, in 2001 he wasn't the president -- 4 Q. If I said 2001, I misspoke. 2011. 5 A. Yes, I do know him to be president at 6 that time. 7 Q. Let me take you back to approximately the 8 early part of this year, January or February. 9 Did you participate in a meeting in 10 approximately February of 2011 in the ward offices 11 of Speaker Madigan along with Congressman Costello, 12 President Cullerton, yourself and Congressman Dan 13 Lipinski? 14 A. That is correct. 15 Q. How did you come -- 16 A. I think it was his district office, 17 though. I don't think it was his ward office. 18 Q. Okay. 19 How did you come to be a participant in 20 that meeting, sir? 21 A. Congressman Costello asked me to attend 22 the meeting with him because he was going to try to 23 sell President Cullerton and Speaker Madigan on him 24 working on a bipartisan map.</p>	<p>1 BY MS. LIGHTFOOT: 2 Q. Sure. 3 What was discussed at that meeting? 4 A. Congressman Costello talked about his 5 desire to try to put together a bipartisan map, 6 getting the Democrats and the Republicans together 7 to agree to a map that would make the vast majority 8 of the members of the Illinois delegation happy. 9 Q. What, if any, reaction to Congressman 10 Costello's stated objective did you have? 11 A. I personally? 12 Q. Yes. 13 A. I don't understand what you mean by that. 14 Q. Did you say anything in response to what 15 Congressman Costello said -- 16 A. I simply said that ten years before, 17 Speaker Hastert and I had come up with a bipartisan 18 map and I thought that it would serve everyone well 19 if we could do the same thing this time around. 20 I said very little because I really felt 21 that I was no longer a member of Congress and I felt 22 that -- I was a little bit squeamish about being 23 there and not being a member of Congress any longer. 24 Q. What, if anything, did President</p>



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<p>13</p> <p>1 Cullerton say in response to the comments from 2 Congressman Costello? 3 A. He said that he would be more than happy 4 to listen to the suggestions that were made by 5 Congressman Costello and the members of the Illinois 6 delegation, but he felt that there was a process 7 that the legislature would be involved in -- in 8 fact, had already started -- and they would probably 9 wind up coming up with their own map. But he would 10 be happy to listen to what Congressman Costello had 11 to say and take it under consideration. 12 Q. What, if anything, did Speaker Madigan 13 say in response to Congressman Costello's comments 14 about a desire to have a bipartisan map? 15 A. I would have to say that Speaker Madigan 16 in his usual fashion had very, very little to say, 17 and whatever it was he had to say, I, frankly, don't 18 remember, but I don't remember it being of anything 19 of any particular significance. 20 Q. Finally, what, if anything, did 21 Congressman Dan Lipinski say in response to the 22 comments from -- 23 A. I don't remember Dan saying anything. 24 Dan probably felt a little uneasy because he was</p>	<p>15</p> <p>1 redistricting. Is that your recollection? 2 A. Correct. There was a lot of 3 conversations about the White Sox since there was a 4 lot of White Sox fans in the room and only one Cub 5 fan, my son. 6 Q. I won't comment about that, being a White 7 Sox fan myself. 8 After this February meeting did you have 9 any further discussions with Congressman Costello 10 about any kind of effort to get a bipartisan plan in 11 place? 12 A. Congressman Costello told me on a number 13 of occasions that he was working with Congressman 14 Shimkus and Congressman Biggert trying to put 15 together a bipartisan map that the Democrats and the 16 Republicans would agree upon, and I guess he was 17 telling me that information because I had been 18 involved ten years earlier, and I guess he felt if 19 there was anything that I wanted to suggest to him 20 that he might be able to do to help facilitate that. 21 But as I mentioned to you earlier, I 22 really wanted to try to stay out of this as much as 23 possible because of my son being the congressman. 24 When he would ask me questions about</p>
<p>14</p> <p>1 there with his father. His father felt very uneasy 2 that he was there. 3 The only reason Dan wound up being there 4 is I asked him to come along because I didn't want 5 people to get the idea that I was doing any 6 negotiating for him in any way, shape or form. He's 7 a big boy. He's a member of Congress. It was his 8 area, not really mine. 9 I was there because Costello asked me to 10 and he was a friend of mine. 11 Q. Prior to that February 2011 meeting had 12 you had any other conversations with anyone else 13 about redistricting in Illinois as it pertained to 14 congressional districts? 15 A. I probably talked to my son about it. 16 Q. I'm not going to ask you about that. 17 Aside from your son did you have -- prior to that 18 February meeting did you have any discussions with 19 any other current member of Congress about 20 congressional redistricting for this year? 21 A. No, not up to that point I had not, no. 22 Q. My understanding is that that meeting 23 lasted for some time, most of which was -- involved 24 conversations unrelated to congressional</p>	<p>16</p> <p>1 redistricting, Jerry directly, I would say to him, 2 "Jerry, I don't want to talk about that. I'm not 3 there anymore." I actually said to him, "It's none 4 of my business." 5 Q. I take it, sir -- did these subsequent 6 conversations that you had with Congressman Costello 7 come up in the context of discussions about other 8 things or were they specific? 9 A. They came up -- he may have called me at 10 sometime to ask me something about redistricting and 11 my opinion on redistricting, but the vast majority 12 of the times we talked about it -- he and I talked 13 at least once a week usually on the telephone. We 14 talked about many different things. 15 Q. That was my sense. I wanted to just 16 verify that. 17 Did there come a point in time where you 18 participated in a meeting in Springfield, Illinois 19 regarding congressional redistricting? 20 A. Yes, there was. 21 Q. Do you recall when that was, sir? 22 A. No, I don't really recall when it was. 23 I'm sure I could check my schedule, but I'm sure 24 that you have it there also.</p>



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<p>17</p> <p>1 Yes, there was a meeting in Springfield, 2 Illinois in President Cullerton's office. It was 3 President Cullerton, Speaker Madigan, Congressman 4 Costello and myself. 5 Congressman Costello had told me prior -- 6 Q. Let me just -- 7 A. I'm sorry. 8 Q. I have to do what's called, "lay a 9 foundation." Before we get to what was discussed, 10 let me piece out a few more details. 11 This was in President Cullerton's office. 12 It was yourself, Speaker Madigan and Congressman 13 Costello; is that correct? 14 A. Correct. 15 Q. Anybody else that was part of that 16 meeting aside from the people that you just 17 identified? 18 A. There were staff members from Cullerton's 19 staff that came in and out, but I really don't know 20 what their names were or anything like that. 21 Q. Was Congressman Quigley a part of that 22 discussion? 23 A. No, he was not. I mean, his name may 24 have came up. He wasn't at the meeting.</p>	<p>19</p> <p>1 really don't remember if I called or if she called 2 me, Nancy Kimmy -- Nancy Kimmy is a close associate 3 of Judy Barr Topinka. She had called me numerous 4 times during the redistricting process to ask me 5 what I knew about it and I kept telling her I knew 6 almost nothing. 7 She used to call me on a regular basis. 8 Now I may have called her that morning or she may 9 have called me. One way or another I told her that 10 I was on my way down to Springfield. Costello had 11 asked me to accompany him to try to persuade 12 President Cullerton and Speaker Madigan on accepting 13 this bipartisan map he had worked out. 14 I said to her that I would feel better 15 about it if I knew for sure that the Republicans 16 were on board for this map. She asked me if I would 17 take a call from Congressman Shimkus and I said yes, 18 I would. 19 Q. Did you end up having a discussion with 20 Congressman Shimkus on your way down to Springfield? 21 A. Yes. Congressman Shimkus called me and I 22 told him I was on my way down to Springfield to try 23 to help Congressman Costello persuade the president 24 and the speaker to accept this map.</p>
<p>18</p> <p>1 Q. That's what I'm asking. Was he 2 physically present for any part of that meeting? 3 A. No, absolutely not. 4 Q. How did you come to be in this meeting in 5 Springfield? 6 A. Congressman Costello told me that he had 7 worked out a bipartisan map with Congressman Shimkus 8 and Congresswoman Biggert that would be ten 9 Democrats and eight Republicans and he wanted me to 10 accompany him to Springfield to try to sell 11 President Cullerton and Speaker Madigan on this 12 bipartisan map that he had worked out. 13 Q. I take it you agreed to accompany him to 14 the meeting? 15 A. Yes, I did. 16 Q. Did you see any version of the map -- of 17 a map before you went to this meeting in 18 Springfield? 19 A. No, I did not. 20 Q. Did you learn any particulars about the 21 purported bipartisan map other than what you've 22 identified, which is ten Democratic districts and 23 eight Republican districts? 24 A. On the way down to Springfield that day I</p>	<p>20</p> <p>1 I said I was told that it is 10 Democrats 2 and eight Republicans. "John, is that correct?" He 3 says, "Yes, that is correct." 4 Q. Did you and Congressman Shimkus talk 5 about anything else in that telephone call? 6 A. We talked about the redistricting process 7 and that he was onboard for it. I probably said to 8 him too, or he may have said to me, that Judy 9 Biggert was negotiating also with Costello for the 10 Republicans. 11 I probably asked him about where was Judy 12 on it, Biggert. He said she supported it also ten 13 to eight, the ten to eight map. 14 She actually called me when I got to 15 Springfield, but unfortunately at the time I was 16 having some health problems and I said, "I can't 17 really talk to you right now, Judy, but I'll try to 18 get back to you later on." I never did get back to 19 her. 20 Q. We started this part of the discussion by 21 me asking you whether or not you learned prior to 22 the meeting any other specific details about the 23 composition of the map and I think you testified 24 that your understanding was it was going to be 10</p>



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<p>21</p> <p>1 Democrats, eight Republicans. Did you find out any 2 other details about the supposed map before you got 3 into the meeting itself? 4 A. What kind of details? 5 Q. So, for example, did you find out any 6 information about what geography -- what the 7 boundaries of Congressional District 3, your son's 8 district, were going to be? 9 A. My son's district? 10 Q. Yeah. 11 A. No. 12 Q. Did you find out the boundaries of any 13 other district within the map prior to that 14 Springfield meeting? 15 A. I believe in the conversation with 16 Shimkus he mentioned to me that the 10/8 map that 17 the Republicans were agreeing on at that particular 18 time had only one Hispanic district. 19 Q. Are you certain that Congressman Shimkus 20 told you that he was agreeing to -- that the 21 Republicans were agreeing to the map that 22 Congressman Costello was taking to Springfield? 23 MR. BRUCE: Objection to form. 24 MR. SHANNON: Join.</p>	<p>23</p> <p>1 Q. Let's talk about the meeting itself then. 2 What was discussed in that meeting? 3 A. Congressman Costello made a presentation 4 of having a bipartisan map, ten Democrats, eight 5 Republicans that he believed the Republicans were 6 supporting that could probably pass the legislature. 7 Once again, President Cullerton said he 8 would be happy to take a look at that map but they 9 were pretty far along in the process of developing 10 their own map and that he would listen to what Jerry 11 had to say but -- he was being polite and he was 12 telling us that they were drawing the map themselves 13 out of respect to a former member and a member; they 14 were going to listen to the argument that was being 15 presented, but it really wasn't going anyplace. 16 I myself, I mentioned to you I was having 17 some health problems at the time, and at the meeting 18 I, unfortunately, really added nothing to the 19 attempt to persuade the legislature. 20 Q. What, if anything, did Speaker Madigan 21 say in the meeting? 22 MR. BRUCE: Objection. Irrelevance. Hearsay. 23 MR. SHANNON: You can answer, Congressman. 24</p>
<p>22</p> <p>1 You can answer, Congressman. 2 BY THE WITNESS: 3 A. He told me that he had agreed to a 10 4 Democrats, eight Republicans with Congressman 5 Costello. 6 I can't tell you because I didn't see any 7 maps that the 10/8 split Shimkus was agreeing to was 8 the same one that Costello was working on. 9 I didn't see either one of their maps, 10 but I assume when they both come up with 10/8 that 11 they are probably talking about the same maps. 12 BY MS. LIGHTFOOT: 13 Q. For example, did Congressman Shimkus tell 14 you either in that phone call when you were on your 15 way down to Springfield or at any other time that 16 the Republicans had not agreed on any specific map? 17 A. Did John Shimkus tell me that? 18 Q. Yes. 19 A. No. Every indication I had was that they 20 had agreed on this ten to eight map. 21 Q. I believe you said that you never did end 22 up having a conversation with Congresswoman Biggert 23 regarding the map? 24 A. No, I didn't.</p>	<p>24</p> <p>1 BY THE WITNESS: 2 A. I think the only concrete thing he said 3 was that we seem to be pretty far along in 4 developing a map with our hearings and so forth. 5 We'll certainly think about what you're 6 talking about, Congressman. That was about it. 7 For as long as the two meetings took, 8 there was very little time, in reality, spent on 9 this redistricting process. 10 BY MS. LIGHTFOOT: 11 Q. That was going to be my next question. 12 How long did the discussion regarding congressional 13 redistricting last in that Springfield meeting? 14 A. It's a very difficult question for me to 15 answer. I'll say between 20 minutes and 30 minutes. 16 Q. You said I think that Congressman 17 Costello made a presentation of some sort. Was that 18 just an oral presentation or did he actually present 19 any kind of a map? 20 A. I don't believe Jerry had any kind of map 21 whatsoever. 22 Q. Do you remember seeing any kind of map in 23 that meeting? 24 A. There were maps that President Cullerton</p>



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<p>25</p> <p>1 had but they were simply -- they had no boundaries 2 on them. It was simply we can create a democratic 3 district here and we can create one over here and we 4 can create one over there. That's all there was. 5 There weren't any boundaries to any of 6 these districts at that particular time. There may 7 have been some maps that existed that had the actual 8 districts on it, but they were not presented at that 9 meeting. 10 Q. After that meeting did you have any other 11 contact with Congressman Shimkus? 12 A. Yes. On the way back to Chicago, 13 Congressman Shimkus called me and asked me how the 14 meeting went, and I told him that Congressman 15 Costello made a presentation for a bipartisan map, 16 but I didn't think that the legislature was going to 17 accept the map that he and Shimkus and Biggert had 18 worked out or were working out. It didn't look that 19 optimistic to me. 20 Q. What, if anything, did Congressman 21 Shimkus say in response? 22 A. He talked about the possibility of doing 23 an 11 Democrats, seven Republicans. I says, "John, 24 if you want to do that, you call Costello and talk</p>	<p>27</p> <p>1 A. No. I think -- Speaker Hastert and I are 2 friends. I think some time after that second 3 meeting he called me to inquire about what I might 4 know and I said to him at the time, I says, "I'm 5 trying to stay out of it. Why don't you call 6 Costello and talk to him about it." And that was 7 about it. Other than that conversation, no. 8 Q. Other than what you've described as the 9 two meetings regarding -- that involved Senate 10 President Cullerton and Speaker Madigan, did you 11 have any other conversations with any current member 12 of the Illinois General Assembly regarding 13 congressional redistricting in 2011? 14 A. No. 15 Q. Did you have any discussions at all in 16 2011 with any staff person acting on behalf of 17 President Cullerton? 18 A. No. 19 Q. Did you have any conversations with any 20 staff member in 2011 acting on behalf of Speaker 21 Madigan concerning congressional redistricting? 22 A. I may have spoken to Tim Mapes about it 23 in a -- there was another conversation that I had 24 with him.</p>
<p>26</p> <p>1 to Costello about it. I'm not going to any more 2 meetings in regards to the situation." 3 Q. Did you have any subsequent conversation 4 with Congressman Shimkus about congressional 5 redistricting after that phone call on the way back? 6 A. No. I haven't talked to John since. 7 Congresswoman Biggert never did call me back. Nor 8 did I call her back. 9 Q. What about Congressman Costello? Did you 10 have any discussions with him after that Springfield 11 meeting regarding congressional redistricting? 12 A. I think -- we did have a conversation 13 about it. He asked me what I thought and I said, "I 14 don't think you're going to get your bipartisan map, 15 Jerry." I kidded him. I said, "You're just not as 16 good a negotiator as I was ten years ago." Hastert 17 and I bursted out. I says, "Let's talk about 18 something else," and we went on to something else. 19 The whole process was difficult for me 20 because I didn't think from the beginning I should 21 really be involved in it. 22 Q. Did you have any contact with any other 23 republican member of Congress at any point in this 24 year, in 2011, about congressional redistricting?</p>	<p>28</p> <p>1 Actually, that may have been after the 2 map was out and everything. It may not have been 3 before. 4 My wife and I went to Springfield to tour 5 the Abraham Lincoln library and then we went to 6 dinner, and Tim Mapes stopped over to see us for a 7 while and we may have discussed it, but I'm pretty 8 sure that was after everything was over with. 9 Q. Let me ask you a couple additional 10 questions. 11 Why don't I just mark this so we have a 12 frame of reference. 13 (WHEREUPON, a certain document was 14 marked Lipinski Deposition Exhibit 15 No. 1, for identification, as of 16 11-01-2011.) 17 BY MS. LIGHTFOOT: 18 Q. Sir, you've just been handed what's been 19 marked as Lipinski Exhibit No. 1. I will represent 20 to you that this is a copy of the -- what I'll call 21 the northern Illinois, so Chicago Cook County and 22 suburban Cook County congressional districts as 23 adopted into law this year. 24 With this map as a frame of reference,</p>



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<p style="text-align: right;">29</p> <p>1 did you have any involvement in the drafting of any</p> <p>2 of the congressional districts that are reflected in</p> <p>3 Lipinski Exhibit No. 1?</p> <p>4 A. No, I did not.</p> <p>5 Q. Do you know, sir, who was involved in</p> <p>6 drafting any of the congressional districts that are</p> <p>7 reflected in Lipinski Exhibit No. 1?</p> <p>8 A. I assume it was the House and the Senate.</p> <p>9 Q. Do you have any specific firsthand</p> <p>10 knowledge as to who drew any of these particular</p> <p>11 districts, sir?</p> <p>12 A. No. I would assume --</p> <p>13 MR. SHANNON: Congressman, if you have any</p> <p>14 specific knowledge.</p> <p>15 THE WITNESS: No, I don't. No.</p> <p>16 BY MS. LIGHTFOOT:</p> <p>17 Q. For example -- let me just show you.</p> <p>18 Mark this.</p> <p>19 (WHEREUPON, a certain document was</p> <p>20 marked Lipinski Deposition Exhibit</p> <p>21 No. 2, for identification, as of</p> <p>22 11-01-2011.)</p> <p>23 BY MS. LIGHTFOOT:</p> <p>24 Q. You've just been handed what's been</p>	<p style="text-align: right;">31</p> <p>1 You can answer.</p> <p>2 BY THE WITNESS:</p> <p>3 A. No, I don't.</p> <p>4 BY MS. LIGHTFOOT:</p> <p>5 Q. Are you aware that Congressional</p> <p>6 District 4 is the district in which Congressman</p> <p>7 Gutierrez resides?</p> <p>8 A. I assume that was Congressman Gutierrez's</p> <p>9 District 4 when I looked at the map here.</p> <p>10 Q. Very similar to probably the shape of the</p> <p>11 district when you were a member of Congress,</p> <p>12 correct?</p> <p>13 A. Uh-huh.</p> <p>14 Q. Do you have any knowledge about how and</p> <p>15 why the shape and the lines of Congressional</p> <p>16 District 4 came to be?</p> <p>17 MR. SHANNON: Objection. Asked and answered.</p> <p>18 You can answer.</p> <p>19 MR. BRUCE: Objection. Foundation.</p> <p>20 BY THE WITNESS:</p> <p>21 A. How it came to be --</p> <p>22 BY MS. LIGHTFOOT:</p> <p>23 Q. In this particular iteration of -- not</p> <p>24 20 years ago --</p>
<p style="text-align: right;">30</p> <p>1 marked as Lipinski Exhibit No. 2. This is the</p> <p>2 outlines of Congressional District 3.</p> <p>3 Following on the questions that we</p> <p>4 were -- I was just asking you, do you have any</p> <p>5 specific knowledge as to why any of these particular</p> <p>6 boundary lines of Congressional District 3 were</p> <p>7 drawn for any particular reason?</p> <p>8 MR. SHANNON: Objection. Asked and answered.</p> <p>9 You can answer.</p> <p>10 MR. BRUCE: Join.</p> <p>11 THE WITNESS: I can answer?</p> <p>12 MR. SHANNON: You can answer, yes.</p> <p>13 THE WITNESS: Would you repeat the question?</p> <p>14 BY MS. LIGHTFOOT:</p> <p>15 Q. Sure.</p> <p>16 With respect to Congressional District 3,</p> <p>17 and I assume the answer based on your prior</p> <p>18 testimony, but I want to be absolutely certain, do</p> <p>19 you have any particular knowledge why a particular</p> <p>20 line was drawn in any way with respect to the shape</p> <p>21 of Congressional District 3?</p> <p>22 MR. BRUCE: Objection. Foundation. Asked and</p> <p>23 answered.</p> <p>24 MR. SHANNON: Join.</p>	<p style="text-align: right;">32</p> <p>1 A. I know nothing about how this came to be</p> <p>2 at this particular time.</p> <p>3 Q. Do you have any specific knowledge,</p> <p>4 sir -- I may have asked you this before, and if I</p> <p>5 did, your counsel will object properly.</p> <p>6 Do you have any knowledge -- I did ask</p> <p>7 you this, who drew the map. Never mind. I'll</p> <p>8 withdraw the question.</p> <p>9 Did you have any contact with anyone from</p> <p>10 the DCCC regarding the drafting of any district in</p> <p>11 the congressional reapportionment plan for this</p> <p>12 year?</p> <p>13 A. No.</p> <p>14 Q. Are you familiar with an entity known as</p> <p>15 NCEC Services, Inc.?</p> <p>16 A. I had no contact with them whatsoever.</p> <p>17 That entity I don't even know what it is, to be</p> <p>18 perfectly frank with you. I've heard Congressman</p> <p>19 Costello make mention of it. I heard my son make</p> <p>20 mention of it, but I really don't know what they</p> <p>21 are.</p> <p>22 Q. Just so the record is clear, you</p> <p>23 personally have never had any contact with anybody</p> <p>24 associated with NCEC Services, Inc.?</p>



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November 1, 2011

<p>1 A. No.</p> <p>2 MS. LIGHTFOOT: Let's go off the record for a</p> <p>3 moment.</p> <p>4 THE VIDEOGRAPHER: Going off the video record</p> <p>5 at 11:32 a.m.</p> <p>6 (WHEREUPON, a recess was had.)</p> <p>7 THE VIDEOGRAPHER: Back on the video record at</p> <p>8 11:32 a.m.</p> <p>9 BY MS. LIGHTFOOT:</p> <p>10 Q. Congressman, just a couple more</p> <p>11 questions.</p> <p>12 I take it then, based upon your testimony</p> <p>13 right before we took the short break, that you don't</p> <p>14 know anything about the intent of the individual or</p> <p>15 individuals who drafted any portion of the 2011</p> <p>16 congressional reapportionment plan for Illinois,</p> <p>17 correct?</p> <p>18 MR. SHANNON: Objection. Form.</p> <p>19 You can answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A. No, I really don't -- give me the</p> <p>22 question again.</p> <p>23 BY MS. LIGHTFOOT:</p> <p>24 Q. You've testified that you don't know who</p>	<p>1 your mind?</p> <p>2 MS. LIGHTFOOT: Object to the form.</p> <p>3 THE REPORTER: I'm sorry?</p> <p>4 MS. LIGHTFOOT: Object to the form.</p> <p>5 THE REPORTER: And what was your answer?</p> <p>6 MS. LIGHTFOOT: "None whatsoever."</p> <p>7 BY THE WITNESS:</p> <p>8 A. I have no doubt that what I said was</p> <p>9 correct.</p> <p>10 BY MR. BRUCE:</p> <p>11 Q. That's what Congressman Shimkus told you?</p> <p>12 MS. LIGHTFOOT: Same objection.</p> <p>13 BY MR. BRUCE:</p> <p>14 Q. Now with respect to --</p> <p>15 THE REPORTER: What was your answer?</p> <p>16 MR. SHANNON: She may be objecting a little bit</p> <p>17 more than we have in the past, so if you could give</p> <p>18 her one second.</p> <p>19 THE WITNESS: Absolutely. I'm sorry.</p> <p>20 THE REPORTER: What was your answer?</p> <p>21 "That's what Congressman Shimkus told</p> <p>22 you?"</p> <p>23 BY THE WITNESS:</p> <p>24 A. Yes, that is correct, that's what</p>
<p>1 drafted the plan?</p> <p>2 A. That's correct.</p> <p>3 Q. You've testified particularly with</p> <p>4 respect to Congressional Districts CD 3 and CD 4</p> <p>5 that you don't know anything about why lines were</p> <p>6 drawn in any particular way?</p> <p>7 A. Correct.</p> <p>8 Q. I take it then, sir, that you have no</p> <p>9 knowledge about the intent of the drafters of the</p> <p>10 map with respect to any of the congressional</p> <p>11 districts in the reapportionment plan?</p> <p>12 A. That's correct.</p> <p>13 MS. LIGHTFOOT: I have no further questions.</p> <p>14 EXAMINATION</p> <p>15 BY MR. BRUCE:</p> <p>16 Q. Congressman, I just have a couple</p> <p>17 follow-up questions.</p> <p>18 First of all, Congressman Shimkus did</p> <p>19 tell you that he agreed to a map with one Latino</p> <p>20 district?</p> <p>21 A. That is correct.</p> <p>22 MS. LIGHTFOOT: Object to the form.</p> <p>23 BY MR. BRUCE:</p> <p>24 Q. You don't have any doubt about that in</p>	<p>1 Congressman Shimkus told me.</p> <p>2 BY MR. BRUCE:</p> <p>3 Q. Congressman, was it your understanding,</p> <p>4 based upon your discussions with Congressman Shimkus</p> <p>5 and others, that he was representing the other</p> <p>6 republican members of the congressional delegation</p> <p>7 in his efforts to engage in the redistricting</p> <p>8 process?</p> <p>9 MS. LIGHTFOOT: Object to the form.</p> <p>10 Foundation.</p> <p>11 BY THE WITNESS:</p> <p>12 A. Yes.</p> <p>13 BY MR. BRUCE:</p> <p>14 Q. Did he also tell you that they had</p> <p>15 agreed -- "they," meaning the other republican</p> <p>16 congressional congressman that he was working on</p> <p>17 behalf of -- that they also agreed to a</p> <p>18 congressional map with one Latino district?</p> <p>19 MS. LIGHTFOOT: Object to the form.</p> <p>20 Foundation.</p> <p>21 BY THE WITNESS:</p> <p>22 A. He told me that they had agreed to the</p> <p>23 10/8 and that he told me there was only one Hispanic</p> <p>24 district.</p>



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<p>37</p> <p>1 From that I would assume that the other</p> <p>2 Republicans knew that also, but none of the other</p> <p>3 Republicans ever told me that directly.</p> <p>4 BY MR. BRUCE:</p> <p>5 Q. I understand. You understood in your</p> <p>6 discussions with him he was speaking on their</p> <p>7 behalf?</p> <p>8 A. Correct.</p> <p>9 MS. LIGHTFOOT: Object to the form.</p> <p>10 Foundation.</p> <p>11 BY MR. BRUCE:</p> <p>12 Q. Congressman, let me switch topics and</p> <p>13 talk about a different area.</p> <p>14 As I understand it from your background,</p> <p>15 you have been an active member of Illinois</p> <p>16 government for at least four decades?</p> <p>17 A. Well, I was an alderman for eight years</p> <p>18 and I was in the U.S. Congress for 22 years. So</p> <p>19 that's 30 years. Illinois government, I've never</p> <p>20 served in Springfield.</p> <p>21 Q. You're familiar, as I understand it,</p> <p>22 based on your testimony today, with legislators in</p> <p>23 Illinois; is that correct?</p> <p>24 A. Yes, I am.</p>	<p>39</p> <p>1 Berrios?</p> <p>2 A. I know of Representative Berrios. I</p> <p>3 don't believe I've ever met her.</p> <p>4 Q. Do you understand that she's Joe Berrios'</p> <p>5 daughter?</p> <p>6 A. Yes, I do.</p> <p>7 Q. You know Joe?</p> <p>8 A. Yes, I do.</p> <p>9 Q. You understand that Representative</p> <p>10 Berrios is a Latino?</p> <p>11 A. Yes, I do.</p> <p>12 Q. With respect to Representative Chapa</p> <p>13 LaVia, are you familiar with that representative?</p> <p>14 MS. LIGHTFOOT: You probably want to spell that</p> <p>15 for the record.</p> <p>16 MR. BRUCE: C-h-a-p-a L-a-V-i-a.</p> <p>17 BY THE WITNESS:</p> <p>18 A. She's from Aurora, correct?</p> <p>19 Yes, I met her a couple of times at the</p> <p>20 airport, actually.</p> <p>21 BY MR. BRUCE:</p> <p>22 Q. Do you understand that Representative</p> <p>23 Chapa LaVia is a Latino?</p> <p>24 A. Yes, I do.</p>
<p>38</p> <p>1 Q. You're familiar with legislative</p> <p>2 leadership and who they are?</p> <p>3 A. I certainly am.</p> <p>4 Q. I'd like to turn now to the members of</p> <p>5 the Latino delegation in the Illinois Senate and the</p> <p>6 Illinois House. I take it you're familiar with</p> <p>7 them?</p> <p>8 A. I'm familiar with most House members.</p> <p>9 Q. With respect to the House members in the</p> <p>10 Illinois House, are you familiar with Representative</p> <p>11 Acevedo, A-c-e-v-e-d-o?</p> <p>12 MS. LIGHTFOOT: I'm going to object to this</p> <p>13 whole line of questions on relevance grounds.</p> <p>14 BY MR. BRUCE:</p> <p>15 Q. You can answer the question.</p> <p>16 A. Yes, I am.</p> <p>17 Q. Is Representative Acevedo a Latino?</p> <p>18 A. Yes, he is.</p> <p>19 Q. Are you familiar with Representative</p> <p>20 Arroyo, A-r-r-o-y-o?</p> <p>21 A. Yes, I am.</p> <p>22 Q. Is Representative Arroyo a Latino?</p> <p>23 A. Yes, he was.</p> <p>24 Q. Are you familiar with Representative</p>	<p>40</p> <p>1 Q. With respect to Representative Crespo,</p> <p>2 C-r-e-s-p-o, is Representative Crespo a Latino?</p> <p>3 A. I've never met that representative. I</p> <p>4 don't know.</p> <p>5 Q. What about Representative Hernandez?</p> <p>6 A. Yes.</p> <p>7 Q. Is Representative Hernandez a Latino?</p> <p>8 A. Yes.</p> <p>9 Q. Is Representative Soto -- are you</p> <p>10 familiar with Representative Soto?</p> <p>11 A. I know who she is.</p> <p>12 Q. Is she a Latino?</p> <p>13 A. Yes, she is.</p> <p>14 Q. Similarly, on the Senate side are you</p> <p>15 familiar with Senator Delgado?</p> <p>16 A. I know who Senator Delgado is, yes.</p> <p>17 Q. Is Senator Delgado, to your</p> <p>18 understanding, a Latino?</p> <p>19 A. Yes.</p> <p>20 Q. With respect to Senator Munoz, is Senator</p> <p>21 Munoz a Latino, to your knowledge?</p> <p>22 A. To my knowledge he is.</p> <p>23 Q. With respect to Senator Sandoval, is</p> <p>24 Senator Sandoval a Latino?</p>



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<p>41</p> <p>1 A. Yes.</p> <p>2 Q. Lastly, Senator Martinez, do you know</p> <p>3 Senator Martinez?</p> <p>4 A. No, I do not.</p> <p>5 Q. Do you know if Senator Martinez is a</p> <p>6 Latino or not?</p> <p>7 MS. LIGHTFOOT: Object to form and foundation.</p> <p>8 You're clearly calling for the witness to speculate</p> <p>9 since he doesn't know.</p> <p>10 MR. SHANNON: If you know.</p> <p>11 BY THE WITNESS:</p> <p>12 A. I don't know.</p> <p>13 BY MR. BRUCE:</p> <p>14 Q. Congressman, was it your understanding</p> <p>15 that the Latino delegation both in the Illinois</p> <p>16 House and the Illinois Senate supported the map, the</p> <p>17 congressional map that was ultimately passed into</p> <p>18 law?</p> <p>19 MS. LIGHTFOOT: Object to the form.</p> <p>20 Foundation.</p> <p>21 MR. SHANNON: You can answer.</p> <p>22 BY THE WITNESS:</p> <p>23 A. Yes.</p> <p>24</p>	<p>43</p> <p>1 (WHEREUPON, a recess was had.)</p> <p>2 THE VIDEOGRAPHER: Going back on the record at</p> <p>3 11:42 a.m.</p> <p>4 BY MR. BRUCE:</p> <p>5 Q. Congressman, I have one last line of</p> <p>6 questions. With respect to the conversation that</p> <p>7 you had with Congressman Shimkus, did he tell you</p> <p>8 which republican congressmen would be left without a</p> <p>9 Congressional district in the proposals that he was</p> <p>10 speaking to you about?</p> <p>11 MS. LIGHTFOOT: Object to the form.</p> <p>12 Foundation.</p> <p>13 MR. SHANNON: You can answer.</p> <p>14 BY THE WITNESS:</p> <p>15 A. Yes, he did.</p> <p>16 BY MR. BRUCE:</p> <p>17 Q. Which congressmen, republican</p> <p>18 congressmen, did he indicate would not be left with</p> <p>19 a seat?</p> <p>20 A. Johnson, Walsh and Manzullo.</p> <p>21 MR. BRUCE: That's all the questions I have.</p> <p>22 Thank you.</p> <p>23 MS. LIGHTFOOT: Let me just ask a follow up to</p> <p>24 that.</p>
<p>42</p> <p>1 BY MR. BRUCE:</p> <p>2 Q. How do you know that, Congressman?</p> <p>3 A. I read the results in the newspaper.</p> <p>4 Q. You read the roll call results and what</p> <p>5 was reported in the newspaper; is that correct?</p> <p>6 A. That is correct.</p> <p>7 Q. You noted that the Latino caucuses in</p> <p>8 each of the chambers did vote in favor of the</p> <p>9 congressional map that we're here to talk about here</p> <p>10 today?</p> <p>11 MS. LIGHTFOOT: Object to the form.</p> <p>12 Foundation. Leading.</p> <p>13 BY MR. BRUCE:</p> <p>14 Q. Is that correct?</p> <p>15 A. Yes, that is correct.</p> <p>16 MR. BRUCE: That's all the questions I have.</p> <p>17 Thank you, Congressman.</p> <p>18 MS. LIGHTFOOT: Thank you, Congressman, for</p> <p>19 your time.</p> <p>20 MR. SHANNON: Give me one second.</p> <p>21 THE VIDEOGRAPHER: Going off the video record</p> <p>22 at 11:40 a.m.</p> <p>23</p> <p>24</p>	<p>44</p> <p>1 FURTHER EXAMINATION</p> <p>2 BY MS. LIGHTFOOT:</p> <p>3 Q. Your testimony is that Congressman</p> <p>4 Shimkus told you that three republican members would</p> <p>5 be giving up their seats by virtue of a bipartisan</p> <p>6 map; is that correct?</p> <p>7 A. That is correct.</p> <p>8 Q. That was Johnson, Walsh and who else?</p> <p>9 A. Johnson, Walsh and Manzullo.</p> <p>10 I asked him who it would be. He didn't</p> <p>11 volunteer that information. I said, "Who is going</p> <p>12 to lose out on this, John?" And he mentioned those</p> <p>13 three names.</p> <p>14 MS. LIGHTFOOT: That's all the questions I</p> <p>15 have.</p> <p>16 MR. SHANNON: Okay. We'll reserve.</p> <p>17 THE VIDEOGRAPHER: That will conclude today's</p> <p>18 deposition of William Lipinski on November 1, 2011.</p> <p>19 We're going off the video record at 11:44 a.m.</p> <p>20 FURTHER DEPONENT SAITH NOT.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>



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WILLIAM LIPINSKI

November 1, 2011

<p>1 STATE OF ILLINOIS )  2 ) SS:  3 COUNTY OF DUPAGE )  4 I, KAREN PILEGGI, a Notary Public  5 within and for the County of DuPage, State of  6 Illinois, and a Certified Shorthand Reporter of said  7 state, do hereby certify:  8 That previous to the commencement of  9 the examination of the witness, the witness was duly  10 sworn to testify the whole truth concerning the  11 matters herein;  12 That the foregoing deposition  13 transcript was reported stenographically by me, was  14 thereafter reduced to typewriting under my personal  15 direction, and constitutes a true record of the  16 testimony given and the proceedings had;  17 That the said deposition was taken  18 before me at the time and place specified;  19 That I am not a relative or employee  20 or attorney or counsel, nor a relative or employee  21 of such attorney or counsel for any of the parties  22 hereto, nor interested directly or indirectly in the  23 outcome of this action.  24 IN WITNESS WHEREOF, I do hereunto</p>	<p>45</p>	<p>1 EXAMINATION  2 Page Line  3 WILLIAM LIPINSKI  4 Examination by Ms. Lightfoot 5 9  5 Examination by Mr. Bruce 34 14  6 Further Examination by Ms. Lightfoot 44 1  7  8</p> <p style="text-align: center;">E X H I B I T S</p> <p>10 Lipinski Deposition Exhibit Page Line  11 No. 1..... 28 15  12 No. 2..... 29 21  13  14  15  16  17  18  19  20  21  22  23  24</p>	<p>47</p>
<p>1 set my hand and affix my seal of office at Chicago,  2 Illinois, this 8th day of November, A.D. 2011.  3  4 Notary Public,  5 DuPage County, Illinois.  6 My commission expires 11/05/11.  7  8 CSR Certificate No. 84-3404  9  10  11  12  13  14  15  16  17  18  19  20  21  22  23  24</p>	<p>46</p>	<p>1 DEPOSITION ERRATA SHEET  2  3 Our Assignment No. 286625  4 Committee for Balanced Map v ISBOE  5  6 DECLARATION UNDER PENALTY OF PERJURY  7  8 I declare under penalty of perjury that I  9 have read the entire transcript of my Deposition  10 taken in the captioned matter or the same has been  11 read to me, and the same is true and accurate, save  12 and except for changes and/or corrections, if any,  13 as indicated by me on the DEPOSITION ERRATA SHEET  14 hereof, with the understanding that I offer these  15 changes as if still under oath.  16  17 Signed on the _____ day of  18 _____, 20____.  19 _____  20 WILLIAM LIPINSKI  21  22  23  24</p>	<p>48</p>



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<p>1 DEPOSITION ERRATA SHEET</p> <p>2 Page No. _____ Line No. _____ Change to: _____</p> <p>3 _____</p> <p>4 Reason for change: _____</p> <p>5 Page No. _____ Line No. _____ Change to: _____</p> <p>6 _____</p> <p>7 Reason for change: _____</p> <p>8 Page No. _____ Line No. _____ Change to: _____</p> <p>9 _____</p> <p>10 Reason for change: _____</p> <p>11 Page No. _____ Line No. _____ Change to: _____</p> <p>12 _____</p> <p>13 Reason for change: _____</p> <p>14 Page No. _____ Line No. _____ Change to: _____</p> <p>15 _____</p> <p>16 Reason for change: _____</p> <p>17 Page No. _____ Line No. _____ Change to: _____</p> <p>18 _____</p> <p>19 Reason for change: _____</p> <p>20 Page No. _____ Line No. _____ Change to: _____</p> <p>21 _____</p> <p>22 Reason for change: _____</p> <p>23 SIGNATURE: _____ DATE: _____</p> <p>24 WILLIAM LIPINSKI</p>	49	
<p>1 DEPOSITION ERRATA SHEET</p> <p>2 Page No. _____ Line No. _____ Change to: _____</p> <p>3 _____</p> <p>4 Reason for change: _____</p> <p>5 Page No. _____ Line No. _____ Change to: _____</p> <p>6 _____</p> <p>7 Reason for change: _____</p> <p>8 Page No. _____ Line No. _____ Change to: _____</p> <p>9 _____</p> <p>10 Reason for change: _____</p> <p>11 Page No. _____ Line No. _____ Change to: _____</p> <p>12 _____</p> <p>13 Reason for change: _____</p> <p>14 Page No. _____ Line No. _____ Change to: _____</p> <p>15 _____</p> <p>16 Reason for change: _____</p> <p>17 Page No. _____ Line No. _____ Change to: _____</p> <p>18 _____</p> <p>19 Reason for change: _____</p> <p>20 Page No. _____ Line No. _____ Change to: _____</p> <p>21 _____</p> <p>22 Reason for change: _____</p> <p>23 SIGNATURE: _____ DATE: _____</p> <p>24 WILLIAM LIPINSKI</p>	50	



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